

EXHIBIT 44

Hunters Capital, LLC v. City of Seattle

30(b)(6) and Individual Deposition of Harold Scoggins

Page 1

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

HUNTERS CAPITAL, LLC, et al.,)
Plaintiff,)
vs.) No. 20-cv-00983
CITY OF SEATTLE,)
Defendant.)

VIDEOTAPED VIDEOCONFERENCE 30(B)(6) AND INDIVIDUAL
DEPOSITION UPON ORAL EXAMINATION OF
CITY OF SEATTLE
(HAROLD SCOGGINS)

***PORTIONS OF THIS TESTIMONY ARE DESIGNATED
CONFIDENTIAL AND ARE SEALED
UNDER A SEPARATE COVER.***

Seattle, Washington
(All participants appeared via videoconference.)

DATE TAKEN: SEPTEMBER 14, 2021
REPORTED BY: CINDY M. KOCH, RPR, CRR, CCR #2357

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* * * * *

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1 Q. And on the left part of this slide, it
2 designates that area as the protest response zone; is
3 that correct?
4 A. Yes.
5 Q. Okay. And so on June 8th, within that area, is
6 this slide indicating that anywhere in that area, that
7 the SPD had -- that the SFD had to wait for the Seattle
8 Police Department to secure the area before they would
9 enter?
10 A. Anywhere in the red zone.
11 Q. Okay. That didn't include the yellow area; is
12 that correct?
13 A. It did not.
14 Q. Okay. I understand this slide as defining the
15 protest response zone as the yellow area.
16 Do you feel -- do you feel otherwise?
17 A. I do. The yellow identifies the warm zone.
18 The protest response zone is the red, and it's written
19 in there, "protest hot zone."
20 Q. Okay. I'd like you to look at the left where
21 it says "Protest response zone," colon, and then it has,
22 Denny, Union, Broadway, and 13th.
23 Do you see that?
24 A. Yes.
25 Q. Okay. I understand that as indicating that the

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1 that area -- within the -- within the yellow area for
2 the fire department to respond; correct?
3 A. It could be. Just like any other warm zone
4 that we would set up geographical boundaries for, yes.
5 Q. Okay. And so was it within that sit- -- within
6 that yellow zone you had modified -- the City modified
7 its response for basic life support and advanced life
8 support. I can ask it different -- I can ask that
9 question differently if it -- if it would be clearer for
10 you, which -- let's just re-ask it.
11 So is it the case that within that yellow area,
12 the entire yellow area, bounded by Denny, Union,
13 Broadway and 13th, the Seattle Fire Department had a
14 modified response for basic life support and advanced
15 life support on June 8, 2020?
16 A. Yes.
17 Q. Okay. And as indicated on -- and you spoke a
18 little bit about this earlier, but so for basic life
19 support it required one aid car, one engine, and one
20 battalion chief to respond to that; is that correct?
21 A. Yes.
22 Q. Okay. What's -- what's an aid car?
23 A. An aid car is two firefighter EMTs on an
24 ambulance, basically. Our terminology is to call it an
25 aid car so we can differentiate between an aid car and a

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1 protest response zone was that area, Denny, Union,
2 Broadway, and 13th.
3 Do you have a different understanding?
4 A. I do. That's our warm zone, and this gave our
5 folks situational awareness for this protest hot zone.
6 And so here's some of the challenges, for example, and
7 reason why we have to lay this out a little wider. Just
8 navigating around that area in our vehicles are very
9 challenging just when you look at the red zone that's
10 outlined there. So all of our folks need to have
11 situational awareness for a larger area.
12 Q. Okay. And that larger area was Denny, Union,
13 Broadway, and 13th; is that right?
14 A. Yes.
15 Q. And why -- why do they need to have additional
16 situation -- why do they need to have additional
17 situational awareness within that area?
18 A. Because one never knows what spills outside of
19 the hot zone. So our folks need to really be paying
20 attention. This was on June 8th, so this is the first
21 day that the landscape kind of changed for us. So our
22 folks needed to have situational awareness because you
23 never know what you're going to, you know, come upon in
24 any of these streets around -- around there.
25 Q. It potentially could be unsafe within that --

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1 medic unit, which is two firefighter paramedics in an
2 ambulance.
3 Q. Okay.
4 A. So the level of training is different.
5 Q. Okay. And a battalion chief, can you -- can
6 you kind of describe to me where in the hierarchy a
7 battalion chief sits?
8 A. A battalion chief is the first level of fire
9 management. The rank structure in the organization,
10 from battalion chief it goes up to deputy chief, then
11 transitions to assistant chief, and then to fire chief.
12 The rank and file, the labor side, is firefighter -- we
13 have firefighter drivers, we have all of our technical
14 teams, we have lieutenants, and we have captains. So
15 battalion chief is above the captain level.
16 So in the city, we have the city broken up into
17 five geographical boundaries, and each geographical
18 boundary has a battalion chief that's in charge of
19 between six and eight fire stations, so they're
20 basically the manager in charge of that geographical
21 boundary.
22 Q. Okay. So how many battalion chiefs are there
23 in the city of Seattle?
24 A. Let's see. I believe 24.
25 Q. Okay.

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1 **Q. She is proposing that from sunset to dusk the**
 2 **CHOP red zone expand to the outline of the warm zone for**
 3 **safety.**

4 **Do you see that?**

5 A. I do see that.

6 **Q. Do you know whether that was -- that proposal**
 7 **was ever adopted into policy at the fire department?**

8 A. Into our planning, our operational planning.

9 **Q. Yes.**

10 A. I'm trying to think of that last map because
 11 for most areas it looked like it eventually did expand.
 12 I don't know on June 22, 2020, if it expanded that day.

13 **Q. Then the bullet point between 1 and 2 in this**
 14 **email indicates that the fire department was giving B2**
 15 **chiefs the flexibility to recon and gather information**
 16 **to help with the decisions about staging and when entry**
 17 **is safe.**

18 **Is that -- do you see that, first of all?**

19 A. Yes, I do see that 2.

20 **Q. And is that an accurate description of what**
 21 **was -- the sort of discretion that was given to the**
 22 **chiefs in June 2020, with regard to this area?**

23 A. Yes. We -- we normally give that type of
 24 flexibility to our chiefs to gain situational awareness
 25 so they can share information that would help us with a

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1 safer response.

2 **Q. So would you say the exact boundaries of the**
 3 **red zone could fluctuate depending on what the exact**
 4 **circumstances in a particular incident were?**

5 A. Correct. That goes back to our scenes of
 6 violence situations. So if they spill out, whether
 7 they're outside of this area or in another part of the
 8 city, the response personnel can make those real-time
 9 calls on where to push pause until we have proper
 10 support.

11 **Q. Then in her No. 2, a couple lines there, she**
 12 **indicates that as of the time of this email, June 22,**
 13 **2020, non-SOV events, such as cardiac, are currently**
 14 **treated in the same -- treated the same in the red zone**
 15 **as SOVs.**

16 **Do you see that?**

17 A. I do.

18 **Q. Okay. And SOV refers to scene of violence; is**
 19 **that correct?**

20 A. Yes.

21 **Q. So what do you -- first of all, is her**
 22 **statement of -- is her statement of what was going on on**
 23 **the scene accurate, in your understanding of what was**
 24 **going on with responding to events in the red zone?**

25 MR. FARMER: Objection. Vague as to policy

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1 versus actual incidents.

2 A. I think our folks on the ground were making
 3 real-time decisions based on what was in front of them,
 4 but if a scene of violence or a cardiac event happened
 5 inside of the red zone, the responding units would have
 6 to make those real-time decisions to meet up with law
 7 enforcement and then go to where they needed to go to
 8 treat the patient.

9 BY MR. WEAVER:

10 **Q. Do you know of any instance from June 8th**
 11 **through June 30, 2020, where the fire department went**
 12 **into the red zone with the police and either put out a**
 13 **fire or assisted a victim?**

14 A. I don't know. I would have to look at our
 15 response information, but I don't think that there were
 16 any significant fires during this period of time that we
 17 would have needed to go put out a fire. I think it may
 18 have been more of a medical issue, but I'd have to
 19 follow up on that. I don't know.

20 **Q. Okay. With regard to the medical issues, do**
 21 **you recall any instance in which the fire department**
 22 **went in with the police during the period of June 8th to**
 23 **June 30, 2020, to address a medical issue in the red**
 24 **zone?**

25 A. I don't -- I don't recall because I'm not sure

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1 if there was a response to a location inside of the red
 2 zone for us to actually respond to. For example, at
 3 12th and Pine, I'm not sure if we got a response to go
 4 to 12th and Pine for a medical emergency. I'm not sure
 5 if that actually happened. So I -- I can't be 100
 6 percent sure on that one.

7 **Q. Do you recall that there were some medical**
 8 **emergencies from June 8th through June 30, 2020, that**
 9 **were reported in the red zone?**

10 A. I can take that assumption that there probably
 11 was. It's a busy area, a lot of people there.

12 **Q. Do you recall any shootings that occurred**
 13 **during that time period within the red zone?**

14 A. Yes.

15 **Q. Do you recall whether for any of those**
 16 **shootings the Seattle Fire Department entered the area**
 17 **to treat victims within the red zone with the Seattle**
 18 **Police Department?**

19 A. I do believe we entered the area with the
 20 Seattle Police Department on occasions to treat a
 21 victim. I'm just not sure of the geographical
 22 boundaries based on the day because it was always
 23 changing.

24 **Q. Okay. But you don't recall -- you can't sit**
 25 **here and say that you know of an instance where the**

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1 **Seattle Fire Department treated somebody during the**
 2 **period of June 8th through June 30, 2020, within the red**
 3 **zone; is that right?**

4 A. Right. I -- I can say we entered with law
 5 enforcement to treat a patient. I'm just not 100
 6 percent sure on the geographical boundaries.

7 **Q. Okay. Was it the case for incidents within the**
 8 **red zone, whatever it was on a particular day, that the**
 9 **Seattle Fire Department could not go into the area and**
 10 **would not go into the area unless the police department**
 11 **determined that it would go into the area?**

12 MR. FARMER: Object to the form of the
 13 question.

14 You may answer.

15 A. Sure. In the area that was identified as the
 16 red or the hot zone, it was our practice to partner up
 17 with law enforcement, make sure that we had proper
 18 support, and then go in if we needed to. But that would
 19 be similar to a shooting or a stabbing today. We would
 20 pause, wait for law enforcement to clear the scene, and
 21 then we would go into the scene. So that's our --
 22 that's our standard practice.

23 BY MR. WEAVER:

24 **Q. Was it the practice that for any area or any**
 25 **call within the red zone, as it existed on any day from**

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1 **an MI is? There's a reference to an MI.**

2 A. Myocardial infarction.

3 **Q. Okay. So a heart attack?**

4 A. Yes.

5 **Q. Was what was -- is what's described in this**
 6 **email from Dale Watanabe, and the directions that were**
 7 **given to the person who reported they were having a**
 8 **myocardial infarction, consistent with the policy that**
 9 **was in place on June 20, 2020?**

10 MR. FARMER: Object to the form of the
 11 question.

12 A. Well, this is a real-time situation that the
 13 dispatcher -- because Dale Watanabe is one of our
 14 dispatchers -- gave a caller in the 911 system
 15 information to get to fire station one block east of
 16 your location, Fire Station 25.

17 So I don't know what else was said on that
 18 call. I don't know what other ailments the individual
 19 may have had. But the dispatcher apparently felt
 20 comfortable enough to ask the person to walk to the fire
 21 station one block away. But that's all I'm seeing here.
 22 That's not the situation we wanted.

23 BY MR. WEAVER:

24 **Q. Okay. So Dale Watanabe is a dispatcher, you**
 25 **said. Is he -- okay.**

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1 **June 8th to June 30, 2020, that it was the policy of the**
 2 **Seattle Police -- Fire Department to not enter the area**
 3 **unless the Seattle Police Department accompanied them?**

4 MR. FARMER: Objection. Asked and answered.
 5 Chief, you may answer again.

6 A. Oh, yes, that was our operational plan.
 7 (Exhibit No. 11 marked.)

8 BY MR. WEAVER:

9 **Q. And -- all right. I'll leave it there for now.**
 10 **So if you could go to what I've introduced as**
 11 **Exhibit 11. It's in the chat already.**

12 A. 11.

13 **Q. So do you have it up?**

14 A. Yes.

15 **Q. Okay. So there was an email that was written,**
 16 **that was then forwarded to you.**

17 **Do you recall the incident discussed in this --**
 18 **in this email from Dale Watanabe?**

19 A. Right. I'll take a look.

20 **Q. Okay.**

21 A. Yes, I've -- I've read that.

22 **Q. Okay. Do you recall that incident?**

23 A. I don't recall the incident, but after reading
 24 it, it does hit the refresh button a bit.

25 **Q. Okay. So what was your understanding of what**

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1 **So do you read his email as saying that --**
 2 **indicating that he was comfortable telling the person to**
 3 **walk to the fire station?**

4 MR. FARMER: Objection. Sorry. Objection.
 5 Calls for speculation.

6 A. No, I don't read that statement in his email,
 7 no.

8 BY MR. WEAVER:

9 **Q. Okay. What is your understanding of what the**
 10 **policy would be today if somebody at 6 -- 1660 12th**
 11 **Avenue called the fire department, indicated that they**
 12 **were having symptoms of a cardiac arrest -- is it your**
 13 **understanding in that situation that it would have been**
 14 **consistent with the current policy, today, to tell them**
 15 **to walk to Fire Station 25?**

16 A. No.

17 **Q. And why is that?**

18 A. Today? We wouldn't have any obstructions
 19 blocking our units from actually making it to this
 20 address location, 1660 12th Avenue. What is it, just
 21 north of the east precinct. So this is probably the
 22 building that is right on 12th, on the east side of the
 23 street there. But we wouldn't have any obstructions
 24 blocking our units from getting there.

25 **Q. Okay. So your understanding is that in this**

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1 A. No.
 2 **Q. Did there become a time around June 7th or**
 3 **June 8, 2020, that the fire department and the police**
 4 **department were concerned that there might be a fire set**
 5 **to the building that houses the east precinct?**
 6 A. There was.
 7 **Q. And what was the source of that information?**
 8 A. I believe it was the FBI.
 9 **Q. Did you talk to the FBI, yourself, about --**
 10 **about that issue?**
 11 A. I did.
 12 **Q. Okay. Can you describe your conversation or**
 13 **conversations with them about that issue?**
 14 A. Sure. Vaguely, he expressed that there was
 15 a -- a credible threat to burn the building, and that's
 16 what we talked about.
 17 **Q. Was that on June 8, 2020? Do you recall?**
 18 A. I'm not sure if it was on June 8th, but if it
 19 wasn't, it was leading up to. I'm not sure of the exact
 20 date and time.
 21 **Q. So what steps did the -- did the fire**
 22 **department take with that information to protect or try**
 23 **to protect the east precinct?**
 24 A. Well, when you say try to protect the east
 25 precinct, I'm not sure what that means.

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1 **Q. From being burned down. Did you do anything in**
 2 **particular?**
 3 A. We don't do pre-deployment of, I don't know,
 4 chemicals -- like you see in the wild lands, for
 5 example.
 6 **Q. Sure.**
 7 A. If a wildfire is coming you can predeploy
 8 things on the structures, but that's not what we do. We
 9 did an assessment. We revealed the building
 10 construction, we reviewed the contiguous walls to the --
 11 we were trying to understand the lay of the land there
 12 with the businesses that were to the south. We reviewed
 13 the distance in that alleyway to the west, to that next
 14 building, to understand, you know, if there was a fire,
 15 what would be the fire spread, what would be our
 16 opportunities and challenges. We reviewed the water
 17 systems and things like that.
 18 **Q. Did you have men and equipment on the ready to**
 19 **fight a fire at that particular location on that day?**
 20 A. As we do every day.
 21 **Q. Okay. There was no special precautions for**
 22 **that area on that day; is --**
 23 A. Well, the precautions that we talked about, the
 24 additional resources and things like that, that we -- we
 25 had that almost every day during this time period. Fire

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1 Station 25 was literally one block --
 2 **Q. Sure.**
 3 A. -- up the street. But each and every day
 4 our 33 stations are staffed and ready to go.
 5 **Q. Okay. So I'd like you to look again at**
 6 **Exhibit 14, and look at -- look at the notes under**
 7 **Slide 10.**
 8 A. Uh-huh.
 9 **Q. And where it says, "June 8 -- June 8 decision**
 10 **tipping point when SPD left its precinct," were you**
 11 **involved in the decision made by the Seattle Police**
 12 **Department to vacate the east precinct on June 8th?**
 13 A. No.
 14 **Q. When did you hear that the Seattle Police**
 15 **Department had made a decision to vacate the east**
 16 **precinct on June 8th?**
 17 A. I don't know exactly, but I'm sure it was
 18 sometime that morning, as we watched the activity around
 19 the precinct.
 20 **Q. How did you find out about it?**
 21 A. It was -- I'm not sure exactly, whether it was
 22 in the meeting or watching the activities that were
 23 unfolding earlier that afternoon. I'm not sure which
 24 came first.
 25 **Q. Did you -- yeah. Sorry. We just talked over**

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1 again.
 2 **So what did you mean by that it was a tipping**
 3 **point when they left the precinct?**
 4 A. Sure. So when they left the precinct, the
 5 protesters initially marched by the precinct, and many
 6 of us thought, okay, well, that -- they'll just have a
 7 new route. But at some point they made a U-turn and
 8 came back into the space, and the tipping point was
 9 repurposing the water barriers and the gate barriers,
 10 and staying in the space. So that changed the landscape
 11 immediately.
 12 **Q. Okay. What did they repurpose the barriers**
 13 **for?**
 14 A. To not -- to not allow traffic north, south,
 15 east, or west on the streets around the east precinct.
 16 MR. WEAVER: Can we go off the record for a
 17 minute?
 18 THE VIDEOGRAPHER: Going off the record.
 19 The time is approximately 1:54 p.m.
 20 (Pause in proceedings.)
 21 THE VIDEOGRAPHER: We are back on the
 22 record. The time is approximately 1:55 p.m.
 23 BY MR. WEAVER:
 24 **Q. When you saw that the protesters had repurposed**
 25 **the barriers, did you have any concerns as a -- as the**

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Q. The City renting a space?

A. Oh, I don't know.

Q. Okay. You don't know anything about Mayor Durkan and a business called the Riveter? Do either of those -- does that ring a bell with you at all?

A. No.

Q. Okay.

A. And it's not to say that those conversations didn't take place, but it -- it would not have been one that impacted the fire department.

Q. Okay. Yeah, I -- I'm just making sure. I didn't expect that you did, but -- can you give me another five minutes? I might be done. I just want to look at my notes. So if we could go off the record for five minutes.

THE VIDEOGRAPHER: Going off the record. The time is approximately 4:53 p.m.

(Recess from 4:53 p.m. to 4:57 p.m.)

THE VIDEOGRAPHER: We are back on the record. The time is approximately 4:57 p.m.

E X A M I N A T I O N (Continuing)

BY MR. WEAVER:

Q. Okay. I do have a few just brief questions.**So with regard to Cal Anderson after July 1st through the end of 2020, do you know of any instances**

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Q. Your City phone, I mean.

A. No.

Q. Okay. And do you have a personal email address that you use?

A. I do.

Q. What's -- what's the email address?

[--- Confidential ---]

MR. FARMER: Cindy, we would -- I'm sorry, Mr. Weaver. Cindy, we would ask that you mark the last question and answer as confidential under the protective order in the case, please.

MR. WEAVER: And we have no objection to that. I expected that, so -- I was actually going to mention that we would keep that confidential.

So unless your attorney has questions, I am done.

MR. FARMER: No questions.

Cindy, we'll reserve signature. Thank you.

THE VIDEOGRAPHER: Thank you. This concludes today's deposition of Harold Scoggins. The time is approximately 5:00 p.m. Going off the record.

(Deposition concluded at 5:00 p.m.)

(Reading and signing was requested

pursuant to FRCP Rule 30(e).)

-o0o-

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where there were yellow or red zones created in or around the park during that time?

A. I don't. I don't think we created any in or around the park, but I'm not 100 percent sure, but I don't think we did.

Q. Do you recall whether there were any scenes of violence declared in the -- in or around the park during the same time period?

A. Are you talking about the time period after the demobilization --

Q. Yeah, July 1st to the end of the year of 2020.

A. Oh, I'm not sure. That's a pretty long time period, so there could have been.

Q. Okay. Has anybody, to your knowledge, attempted to see if they can get any of your previous messages by using your Apple watch as a -- as a source?

A. No.

Q. Is that a City-issued Apple watch?

A. No.

Q. But it is -- it's synced with your City phone; is that right?

A. Yes. Only my City phone.

Q. Okay. At any time -- in June of 2020, was your personal email linked to your phone?

A. No.

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C E R T I F I C A T E

STATE OF WASHINGTON
COUNTY OF PIERCE

I, Cindy M. Koch, a Certified Court Reporter in and for the State of Washington, do hereby certify that the foregoing transcript of the deposition of Harold Scoggins, having been duly sworn, on September 14, 2021, is true and accurate to the best of my knowledge, skill and ability.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 23rd day of September, 2021.



CINDY M. KOCH, CCR, RPR, CRR

My commission expires:

JUNE 9, 2022



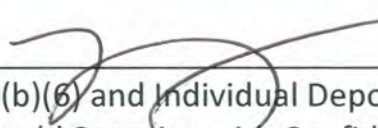
DECLARATION

CASE NAME: Hunters Capital, LLC v. City of Seattle

DATE TAKEN: 9/14/2021

WITNESS: 30(b)(6) and Individual Deposition of Harold Scoggins with Confidential Excerpt

I declare under penalty of perjury under the laws of the State of Washington that I have read my within deposition, and the same is true and accurate, save and except for changes and/or corrections, if any, as indicated by me on the ERRATA flyleaf page hereof.



30(b)(6) and Individual Deposition of
Harold Scoggins with Confidential Excerpt

Signed on the 22 day of October, 2021.



ERRATA

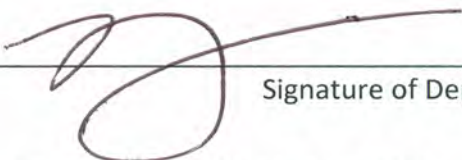
CASE NAME: Hunters Capital, LLC v. City of Seattle

DATE TAKEN: 9/14/2021

WITNESS: 30(b)(6) and Individual Deposition of Harold Scoggins with Confidential Excerpt

CORRECTIONS

Page	Line	Now Reads	Should Read
		<i>I have reviewed the entire document and focused on my answers. They all seem correct, but it was hard to determine my exact answers vs. the words on the paper without having the audio to playback. I think the intent and context is correct.</i>	
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____



Signature of Deponent